

Report of the Meeting

National Advisory Committee on Institutional Quality and Integrity (NACIQI)

August 1-3, 2023



_____/s/_____
Claude Pressnell Jr., EdD, Chair

TABLE OF CONTENTS

EXECUTIVE SUMMARY 4

SUMMARY OF AGENCY-RELATED ACTIONS.....6

ADMINISTRATION UPDATE.....11

REGULATIONS SUBCOMMITTEE REPORT11

ACCREDITOR DASHBOARDS UPDATE.....11

NACIQI POLICY DISCUSSION.....11

DISCLAIMER

This report summarizes the deliberations of the National Advisory Committee on Institutional Quality and Integrity (NACIQI) at its hybrid August 1-3, 2023 meeting. The NACIQI is an advisory committee established by the Higher Education Opportunity Act of 2008 and is subject to the Federal Advisory Committee Act. This report represents the views of the NACIQI. The report has not been reviewed for approval by the Department of Education, and therefore, the report's recommendations do not purport to represent the views of the Department.

EXECUTIVE SUMMARY

NACIQI was most recently authorized by Section 106 of the Higher Education Opportunity Act of 2008. NACIQI's primary functions include advising the Secretary of Education on the establishment and enforcement of criteria for recognition of accrediting agencies under Subpart 2 of Part H, Title IV, of the Higher Education Act of 1965, as amended (HEA), as well as the recognition of specific accrediting agencies or associations or a specific State approval agency. The NACIQI also advises the Secretary on the eligibility and certification process for institutions of higher education under Title IV, of the HEA, including the relationship between accreditation of institutions of higher education and the certification and eligibility of such institutions, and state licensing responsibilities with respect to such institutions.

NACIQI met August 1-3, 2023 using a hybrid model—in which most committee members and some Department staff met in-person while agency representatives, third party commenters, and other Department staff and three committee members participated virtually—to carry out its responsibilities to advise the senior Department official (SDO) with respect to the recognition of accrediting agencies.

NACIQI reviewed the following types of applications at its August 1-3, 2023 meeting:

- Eight applications for renewal of recognition from accrediting agencies;
- One application for a name change of a Military Degree Granting Institution's program; and
- One compliance report.

NACIQI reviews all information submitted by an agency in support of its petition, the staff analysis and report, and third-party comments.

Assistant Secretary for Postsecondary Education, Dr. Nasser Paydar, addressed the NACIQI and other meeting participants. In his remarks, Assistant Secretary Paydar expressed concerns about soaring tuition and shared that incarcerated students are now eligible for Pell Grants and there are hopes that Dreamers will eventually be eligible too. He also shared that the Department has instituted negotiated rulemaking for debt relief and has developed a new income-driven repayment plan, Saving on a Valuable Education (SAVE). In addition, Assistant Secretary Paydar mentioned that in response to the recent Supreme Court's ruling on Affirmative Action, the Department hosted a summit with over 100 college presidents and chancellors to discuss admissions, recruitment, college affordability, and completion. Recommendations from the summit will be published in September, and guidance from the Office of Civil Rights will soon follow.

As co-chairs of the Regulations Subcommittee, Jennifer Blum and Robert Shireman presented regulatory recommendations to the full Committee. The Committee discussed the recommendations extensively and agreed by consensus to forward the recommendations for the Secretary's review and consideration for the impending negotiated rulemaking on accreditation. NACIQI Chairperson Claude Pressnell encouraged the Secretary to consider the recommendations within the context of the Committee's thorough discussion as reflected in the meeting's transcription. The report is posted on the NACIQI website: <https://sites.ed.gov/naciqi/archive-of-meetings/>.

Wallace E. Boston, Chairperson of the Accreditor Dashboards Subcommittee, spoke briefly about the most recent changes to the dashboards, and Department staff member Brian Fu explained the dashboards' structural and substantive changes and answered committee members' questions.

At the request of NACIQI Chairperson Pressnell, Herman Bounds, Director of Accreditation, explained the staff's interpretation of "substantial compliance", and the Office of the General Counsel provided committee members with revised sample motion language, including copies of 34 C.F.R. 602.34(g).

During the policy discussion portion of the meeting, committee members discussed the following: (1) Separate and Independent, specifically as it relates to waiver requests; (2) Substantial Compliance, including thoughts about simplifying its usage or eliminating it altogether; (3) Changes to the Accreditor Dashboards and the need for the subcommittee to reconvene to discuss strengths and weaknesses of the recent changes; (4) Acknowledgment that the guidance in the Federal Register Notice recommending that agencies keep opening comments to a minimum and focus on areas of noncompliance was beneficial given the brevity and organization of agency representatives' opening remarks; (5) Request that Final Summary Reports include headers rather than just the regulation numbers, so that it is clear to committee members what the actual problems are while they are reading petitions in E-recognition; (6) Whether substantive changes are applicable to programmatic agencies, with the suggestion that the issue needs further research and discussion among Department staff; (7) Whether agencies should be seeking a "federal link" just to be federally recognized when it is not necessary; and (8) Degree inflation, including who is responsible for the inflation and whether it is beneficial for students, especially as it relates to costs.

NACIQI members in attendance for all or part of the meeting included Claude Pressnell, Jr. (Chair), Zakiya Smith Ellis (Vice-Chair), Kathleen Sullivan Alioto, Roslyn Clark Artis, Jennifer Blum, Wallace E. Boston, Debbie Cochrane, Keith Curry, José Luis Cruz Rivera, David A. Eubanks, Arthur Keiser, Michael Lindsay, Molly Hall-Martin, Robert Mayes, Mary Ellen Petrisko, Michael Poliakoff, and Robert Shireman.

U.S. Department of Education representatives who participated in the meeting included: NACIQI Executive Director and Designated Federal Official George Alan Smith; Management and Program Analyst, Monica Freeman; Accreditation Director Herman Bounds; Office of the General Counsel staff members Angela Sierra, Donna Mangold and Christle Sheppard Southall; and accreditation staff members Laco (LG) Corder, Elizabeth Daggett, Paul Florek, Nicole S. Harris, Charity Helton, Reha Mallory, Stephanie McKissic, Karmon Simms-Coates, Michael Stein, Adrienne Walker, and Monica Yassa.

SUMMARY OF AGENCY-RELATED ACTIONS

The following agencies were acted on—in the order they are listed—using NACIQI’s standard review procedures:

Compliance Report | Accrediting Agency

Commission on Massage Therapy Accreditation (COMTA)

Action for Consideration:

- Compliance Report

Recommendation:

- NACIQI recommends that the Senior Department Official accept all the recommendations of the Final Staff Report for the Commission on Massage Therapy Accreditation (COMTA).
- Vote: 13 “Yes”; 3 “No”; 0 “Abstention”; 0 “Recusal”; 0 “Absent”

NACIQI Primary Readers:

- Kathleen Alioto
- Keith Curry

Representatives of the Agency:

- Dawn Hogue, MA, LMT, Executive Director
- Jeff Harmon, Ed.D., Commission Chair; Vice Provost for Strategic Initiatives and Institutional Effectiveness, Thomas Edison State University

Renewal of Recognition | Accrediting Agency

Association of Advanced Rabbinical and Talmudic Schools, Accreditation Commission (AARTS)

Action for Consideration:

- Renewal of Recognition

Recommendation from Second Motion:

- NACIQI recommends that the Senior Department Official accept all the recommendations of the Final Staff Report for AARTS, except that NACIQI also recommends that the Senior Department Official find the agency is substantially compliant with 602.15(a)(1) and require the agency to submit a monitoring report to include updated financial information including the 2022 audit within 12 months.
- Vote: 16 “Yes”; 0 “No”; 0 “Abstention”; 0 “Recusal”; 0 “Absent”

NACIQI Primary Readers:

- Roslyn Clark Artis
- Robert Mayes

Representatives of the Agency:

- Bernard Fryshman, Ph.D., Executive Director
- Mrs. Gitty Rosenbaum, Special Assistant

National Association of Schools of Art and Design, Commission on Accreditation (NASAD)

Action for Consideration:

- Renewal of Recognition

Recommendation:

- NACIQI recommends that the Senior Department Official accept all the recommendations of the Final Staff Report for the National Association of Schools of Art and Design, Commission on Accreditation (NASAD).
- Vote: 14 “Yes”; 0 “No”; 0 “Abstention”; 2 “Recusal”; 0 “Absent”

NACIQI Primary Readers:

- Arthur Keiser
- Zakiya Smith Ellis

Representatives of the Agency:

- Karen P. Moynahan, Executive Director, National Association of Schools of Art and Design
- Richard F. Mann, Legal Counsel, Keller and Heckman, LLP

Council on Accreditation of Nurse Anesthesia Educational Programs (COANAEP)

Action for Consideration:

- Renewal of Recognition

Recommendation:

- NACIQI recommends that the Senior Department Official accept all the recommendations of the Final Staff Report for COANAEP.
- Vote: 14 “Yes”; 0 “No”; 0 “Abstention”; 2 “Recusal”; 0 “Absent”

NACIQI Primary Readers:

- Jennifer Blum
- Molly Hall-Martin

Representatives of the Agency:

- John O’Donnell, DrPH, MSN, RN, CRNA, CHSE, FSSH, FAANA, FAAN, COA President
- Paul Austin, PhD, CRNA, COA Vice President
- Francis Gerbasi, PhD, CRNA, COA Chief Executive Officer

Commission on Collegiate Nursing Education (CCNE)

Action for Consideration:

- Renewal of Recognition

Recommendation:

- NACIQI recommends that the Senior Department Official accept the recommendations of the Final Staff Report for CCNE.
- Vote: 9 “Yes”; 0 “No”; 0 “Abstention”; 7 “Recusal”; 0 “Absent”

NACIQI Primary Readers:

- Debbie Cochrane
- Michael Poliakoff

Representatives of the Agency:

- Dr. Jennifer Butlin, CCNE Executive Director
- Mr. Benjamin Murray, CCNE Deputy Executive Director
- Dr. Philip R. Martinez, Jr., Chair, CCNE Board of Commissioners
- Dr. Elizabeth Ritt, Immediate Past Chair, CCNE Board of Commissioners

Liaison Committee on Medical Education (LCME)

Action for Consideration:

- Renewal of Recognition

Recommendation:

- NACIQI recommends that the Senior Department Official accept the recommendations of the Final Staff Report for LCME, except that the SDO also find that LCME is substantially compliant with 602.16(a)(1)(i) and require the agency to submit a monitoring report within 12 months of the SDO decision, demonstrating that the agency has clarified its student achievement standards in writing.
- Vote: 10 “Yes”; 4 “No”; 0 “Abstention”; 2 “Recusal”; 0 “Absent”

NACIQI Primary Readers:

- Michael Poliakoff
- José Luis Cruz Rivera

Representatives of the Agency:

- Annette C. Reboli, MD, LCME Chair; Dean, Cooper Medical School of Rowan University
- Jerry R. Youkey, MD, LCME Immediate Past Chair; Founding Dean Emeritus, University of South Carolina School of Medicine, Greenville
- Barbara Barzansky, PhD. MHPE, LCME Co-Secretary
- Veronica M. Catanese, MD, MBA, LCME Co-Secretary
- Jennifer A. Semko, JD, LCME Counsel, Baker and McKenzie

Northwest Commission on Colleges and Universities (NWCCU)

Action for Consideration:

- Renewal of Recognition

Recommendation:

- NACIQI recommends that the Senior Department Official accept all of the recommendations of the Final Staff Report for NWCCU.
- Vote: 13 “Yes”; 1 “No”; 0 “Abstention”; 0 “Recusal”; 2 “Absent”

NACIQI Primary Readers:

- David Eubanks
- Mary Ellen Petrisko

Representatives of the Agency:

- Dr. Sonny Ramaswamy, President, NWCCU
- Dr. Marlene Tromp, Chair, NWCCU Board of Commissioners; President, Boise State University
- Dr. Thayne McCulloh, Past Chair and Commissioner, NWCCU Board of Commissioners; President, Gonzaga University
- Dr. Selena Grace, Executive Vice President, NWCCU

Third-Party Commenters:

- Dr. Bruce Kusch, President, Ensign College
- Dr. Federico Zaragoza, President, College of Southern Nevada

National Defense University

Action for Consideration:

- Name Change of Degree Program

Recommendation:

- In accordance with the 1954 Federal Policy Governing the Granting of Academic Degrees by Federal Agencies and Institutions and the revised Department of Defense Instructions dated April 7, 2011, the National Advisory Committee on Institutional Quality and Integrity (NACIQI) recommends that the Secretary approve the request of the National Defense University (NDU) College of Information and Cyberspace to change the name of its Master of Science in Government Information Leadership to the Master of Science in Strategic Information and Cyberspace Studies to better align the name of the degree with the College's name, mission, and program outcomes and that the Secretary approve NDU's request that the name change be granted retroactively, starting on August 1, 2021, to accommodate the first graduating classes of 2022 and 2023.
- Vote: 14 “Yes”; 0 “No”; 0 “Abstention”; 0 “Recusal”; 2 “Absent”

NACIQI Primary Readers:

- Mary Ellen Petrisko

- D. Michael Lindsay

Representative of the Agency

- Cassandra C. Lewis, Chancellor

American Optometric Association, Accreditation Council on Optometric Education (AOA-ACOE)

Action for Consideration:

- Renewal of Recognition

Recommendation:

- NACIQI recommends that the Senior Department Official accept all the recommendations of the Final Staff Report for AOA-ACOE.
- Vote: 14 “Yes”; 0 “No”; 0 “Abstention”; 0 “Recusal”; 2 “Absent”

NACIQI Primary Readers:

- Robert Mayes
- Robert (Bob) Shireman

Representatives of the Agency

- Dr. G. Timothy Petito, ACOE Chair
- Stephanie Puljak, ACOE Director

Academy of Nutrition and Dietetics, Accreditation Council for Education in Nutrition and Dietetics (ACEND)

Action for Consideration:

- Renewal of Recognition

Recommendation:

- NACIQI recommends that the Senior Department Official accept the recommendations of the Final Staff Report for ACEND.
- Vote: 11 “Yes”; 0 “No”; 0 “Abstention”; 3 “Recusal”; 2 “Absent”

NACIQI Primary Readers:

- Wallace Boston
- Debbie Cochrane

Representatives of the Agency

- Rayane AbuSabbah, PhD, RD; Executive Director, Accreditation Council for Education in Nutrition and Dietetics
- Long Wang, PhD, RDN, FAND, Chair, ACEND Board 2023-2024
- Lauren Bozich, MS, RD, LDN, Senior Director of Accreditation

SUBSTANTIAL COMPLIANCE AND SAMPLE MOTIONS

At the request of NACIQI Chairperson Pressnell, Herman Bounds, Director of Accreditation, explained the staff's interpretation of "substantial compliance", and the Office of the General Counsel provided committee members with revised sample motion language, including copies of 34 C.F.R. 602.34(g).

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